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*Counsel for Defendant Blue Raven Solar,
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7 *Attorneys for Plaintiff Louis Naiman*

8 *[Additional Counsel Listed on Signature Page]*

9
10 **IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

11 LOUIS NAIMAN, on behalf of himself and
others similarly situated,

No. 2:19-cv-1643-JAD-EJY

12 Plaintiff,

13 v.
**JOINT MOTION TO EXTEND
DEADLINES**

14 BLUE RAVEN SOLAR, LLC,

15 Defendant.

16 Plaintiff Louis Naiman and Defendant Blue Raven Solar, LLC respectfully move this
17 Court for an extension of the upcoming deadlines set forth in the Case Scheduling Order entered
18 on January 31, 2020 (Doc. 31). The parties request this extension of the case schedule to allow
19 them additional time to complete discovery during the ongoing COVID-19 pandemic.

20 The parties have worked diligently to complete this phase of discovery according to the
21 schedule previously entered by the Court despite the current circumstances. To date, the parties
22 have agreed on search terms to apply to Blue Raven's document collected and Blue Raven
23 recently completed their production of documents. The parties have also exchanged potential
24 deposition dates for depositions that Plaintiff has noticed. The new proposed deadlines should
25 provide sufficient time for the parties to negotiate a protocol for remote depositions of Blue
26 Raven's witnesses, complete a supplemental collection and production of documents, and take all
27 noticed depositions. The parties have tentatively agreed to schedule depositions for July and
28

1 August 2020 to accommodate the witnesses' availability, allow time to negotiate a remote
2 deposition protocol due to the limitations on travel applicable to the parties, witnesses, and their
3 attorneys, and allow for the completion of the supplemental document production (i.e., a
4 production of documents created after the initial collection of documents earlier this year).

5 The parties request that the following deadlines be extended as indicated below to ensure
6 sufficient time to complete this phase of discovery prior to briefing on a motion for summary
7 judgment:

<u>EVENT:</u>	<u>CURRENT DATE:</u>	<u>PROPOSED DATE:</u>
Deadline for discovery into vicarious liability issues	May 29, 2020	August 28, 2020
Amendment of Pleadings	June 12, 2020	September 11, 2020
Deadline for Blue Raven Solar's motion for summary judgment on vicarious liability	June 19, 2020	September 18, 2020
Deadline for Mr. Naiman's opposition to motion for summary judgment	July 10, 2020	October 9, 2020
Deadline for Blue Raven Solar's reply in support of motion for summary judgment	July 24, 2020	October 23, 2020

18 A proposed Order is attached.
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1 Respectfully submitted,

2 **/s/ Jonathan P. Misny**

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19 **/s/ James H. Moon, per auth. 5/29/20**

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LLC*

7 *Attorneys for Plaintiff Louis Naiman*

8 *[Additional Counsel Listed on Signature Page]*

9 **IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF NEVADA**

10 LOUIS NAIMAN, on behalf of himself and
 11 others similarly situated,

No. 2:19-cv-1643-JAD-EJY

12 Plaintiff,

13 **AMENDED CASE SCHEDULING ORDER**

14 v.
 15 BLUE RAVEN SOLAR, LLC,

Defendant.

16 Upon joint motion of the parties, and for good cause shown,

17 IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that the following deadlines
 18 set forth in the Case Scheduling Order entered on January 31, 2020 (Doc. 31) are hereby extended
 19 as indicated below:

21 **EVENT:**

**PREVIOUS
 DEADLINE:**

**EXTENDED UP TO
 AND INCLUDING:**

23 Deadline for discovery into vicarious liability
 issues

May 29, 2020

August 28, 2020

25 Amendment of Pleadings

June 12, 2020

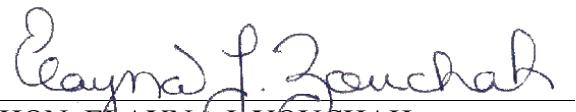
September 11, 2020

26 Deadline for Blue Raven Solar's motion for
 summary judgment on vicarious liability

June 19, 2020

September 18, 2020

1	<u>EVENT:</u>	<u>PREVIOUS DEADLINE:</u>	<u>EXTENDED UP TO AND INCLUDING:</u>
2	Deadline for Mr. Naiman's opposition to	July 10, 2020	October 9, 2020
3	motion for summary judgment		
4	Deadline for Blue Raven Solar's reply in	July 24, 2020	October 23, 2020
5	support of motion for summary judgment		

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8 Elayna J. Youchah
9 HON. ELAYNA J. YOUCRAH
10 UNITED STATES MAGISTRATE JUDGE

11 Dated: May 29, 2020

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